

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

NANCY R., pseudonymously)

Plaintiffs)

vs.)

Case No. CJ-2025-1850

Honorable Anthony Bonner

PLAZA HOTELS, LLC;)

STEVE KETTER;)

MICHAEL WILEY;)

OKC AIRPORT ES, LLC;)

ESH STRATEGIES FRANCHISE, LLC)

KAJAL HOSPITALITY, INC;)

JALIYAN HOSPITALITY, INC.)

SUPER 8 WORLDWIDE, INC;)

RAJ KRUPA HOTEL, LLC;)

DAYS INNS WORLDWIDE, INC;)

CHAND & SAAJ HOSPITALITY, INC;)

RAMADA WORLDWIDE, INC;)

YASH ENTERPRISES, INC;)

HOWARD JOHNSON)

INTERNATIONAL, INC;)

NOOR HOTEL, LLC;)

AMBICA, LLC;)

OM, LLC;)

INDRA, LLC; AND)

G6 HOSPITALITY FRANCHISING, LLC)

Defendants.)

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

APR 15 2025

RICK WARREN
COURT CLERK

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**DEFENDANTS' SPECIAL APPEARANCE AND AGREED MOTION FOR
ENLARGEMENT OF TIME IN WHICH TO ANSWER**

Defendants Super 8 Worldwide, Inc., Days Inn Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. hereby move for an Order granting an enlargement of time in which to file their Answer to Plaintiff's Petition pursuant to 12 O.S. § 2006(B). Plaintiff has agreed with these Defendants to an extension of time of thirty (30) days, until May 14, 2025. In support thereof, Defendants would show the Court:

1. On or about March 24, 2025, these Defendants were served with Plaintiff's Petition.



2. Plaintiff has agreed to provide these Defendants an additional thirty (30) days to respond or otherwise answer Plaintiff's Petition, or until May 14, 2025.

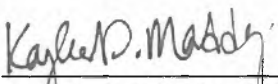
3. This Motion for Enlargement of Time is made without waiving any rights or defenses Defendants may have under 12 O.S. § 2012, and subject to *Young v. Walton*, 1991 OK 20, 807 P.2d 248.

4. This Motion is made in good faith, and not made in order to delay these proceedings or to prejudice the Plaintiff.

7. A proposed Order granting Plaintiff and Defendants' stipulated additional time to file its Answer is hereby attached as "Exhibit A."

WHEREFORE, Defendants Super 8 Worldwide, Inc., Days Inn Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. respectfully requests this Court grant their Motion for Enlargement of Time.

**DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.**

By: 

Kaylee Davis-Maddy, OBA No. 31534
210 Park Avenue, Suite 1200
Oklahoma City, OK 73102
Telephone 405.319.3500
Facsimile 405.319.3509
*Attorney for Defendants Super 8 Worldwide, Inc., Days Inn
Worldwide, Inc., Ramada Worldwide, Inc., and Howard
Johnson International, Inc.*

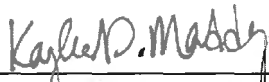
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of April 2025, a true and correct copy of the above and foregoing pleading was mailed to:

Fletcher D. Handley, Jr.
THE HANDLEY LAW CENTER
111 S. Rock Island Ave.,
Post Office Box 310
El Reno, OK 73036

Geoffrey C. Parker
(*Pro Hac Vice* forthcoming)
Hilton Parker, LLC
7658 Slate Ridge Blvd.,
Reynoldsburg, OH 43068

Michael C. Kane
(*Pro Hac Vice* forthcoming)
The702Firm Injury Attorneys
400 South 7th Street, Suite 400
Las Vegas, Nevada 89101



Kaylee P. Davis-Maddy

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